COHEN&GREEN

April 26, 2023

Hon. Jennifer L. Rochon, U.S.D.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: **Roundtree v. City of New York,** **21-cv-10576-JLR-SDA**

Dear Judge Rochon:

I write on behalf of Plaintiff in this case, regarding the deadline set in ECF No. 83. As the parties noted in ECF No. 82, they have reached a settlement in principle on the fees due to Plaintiff under the judgment in this case (ECF No. 60). After that, the Court set a deadline to "reopen the action within thirty days of the date of this Order if the settlement is not consummated." ECF No. 83. Today is the deadline to file a settlement on fees, but the parties are still working out the details. Specifically, Defendants are still working on proposing a form of settlement.

We had hoped to have the settlement done in the time the Court set, and have communicated several times about the status of the draft. I understand Defendants counsel is working diligently on this issue. I have asked Defendants for consent to a 30 day extension of time, but have not yet heard back. However, given that Defendants currently have the pen, I would assume they consent to the extension. And given the Court's caution in ECF No. 83, we file this application now in an abundance of caution. This is the first extension of the post-settlement deadline.

For these reasons, we respectfully request the Court adjourn the deadline in ECF No. 83 for an additional 30 days.

As always, we thank the Court for its continued time and attention.

The request is GRANTED. The parties shall file any motion to reopen the case by **May 25, 2023**.

Dated: April 27, 2023
New York, New York

SO ORDERED.

Jennifer Rochon
JENNIFER L. ROCHON
United States District Judge

Respectfully submitted,

/s/
_____

J. Remy Green
   Honorific/Pronouns: Mx., they/their/them
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cc:
All relevant parties by electronic filing.